

Federal Defenders  
OF NEW YORK, INC.

Southern District  
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David E. Patton  
Executive Director

MEMO ENDORSED

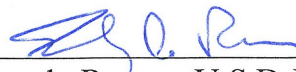
Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge

December 8, 2020

The application is X granted  
\_\_\_\_\_ denied

By ECF

The Honorable Edgardo Ramos  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

  
Edgardo Ramos, U.S.D.J.  
Dated: 12/10/2020  
New York, New York

**Re: United States v. Doran Santiago Ramos**  
**20-CR-4 (ER)**

Dear Judge Ramos:

I write to respectfully request that the Court modify Mr. Doran Santiago Ramos's bail conditions to remove the condition of electronic monitoring, and permit Mr. Ramos to travel domestically for the Christmas and New Years holidays with advance permission from Pretrial services. Pretrial does not object to removing the condition of electronic monitoring.

This Court placed Mr. Ramos on house arrest on March 19, 2020, followed by home detention on May 22, 2020. Mr. Ramos's bail conditions were most recently modified to permit domestic travel strictly for work, with advance permission from Pretrial. According to Mr. Ramos's Pretrial services officers, Mr. Ramos has been compliant with the strict conditions of his pretrial release. Since August 15, 2020, Mr. Ramos has been working with Clothes Minded Group (CMG). CMG is a company based in the United Kingdom and the United States that focuses on producing fashion focused events and connecting fashion brands to retail stores. He has also been in close communication with Pretrial about medical appointments to address underlying health issues previously discussed with the Court. Removing the condition of electronic monitoring after nearly nine months of compliance will allow Mr. Ramos to 1) attend future medical appointments without the complication of applying for removal each time; 2) visit with his family during the holiday season without the stigma of an ankle bracelet; and 3) meet new clients when permitted without immediately signaling his involvement in the criminal justice system.

Mr. Ramos also requests modification of his bail to allow for temporary domestic holiday travel with the advance consent of Pretrial services. Currently, Mr. Ramos is only permitted to travel domestically outside of New York for work. Mr. Ramos would submit a schedule for

holiday related travel and information on lodging and travel arrangements in advance to Pretrial services.

Mr. Ramos's Pretrial officers, Mohammed Ahmed and John Moscato, do not object to removing the condition of ankle monitoring.

Respectfully submitted,

/s/  
Zawadi Baharanyi  
Assistant Federal Defender  
212-417-8735

cc: Brett Kalikow  
Assistant United States Attorney  
(by ECF)